

SUPPLEMENTAL DECLARATION OF JACQUELINE BROWN SCOTT, ESQ.

1. I, Jacqueline Brown Scott, make the following declaration based on my personal knowledge and declare under the penalty of perjury pursuant to 28 U.S.C. § 1746 that the following is true and correct.
2. The annual budget of the Immigration and Deportation Defense Clinic at the University of San Francisco School of Law (“the Clinic”) is approximately \$600,000. The majority of the Clinic’s funding consists of grants to provide legal services to individuals who reside in the Bay Area and Northern California (i.e., Sonoma County), such as the San Francisco Immigration Legal Defense Collaborative grant and the Sonoma County Secure Families Fund.
3. Only some of our grants pay for travel expenses, and all of those grants cover travel only for casework or other legal services. We have no funds in our budget to cover other travel expenses, including the travel expenses we would incur should this case be transferred to San Diego. As a result, the Clinic could not cover such travel expenses with its current budget.
4. In addition, it would be inconvenient for Clinic staff to travel to San Diego to participate in this litigation—for example, to attend hearings or provide testimony regarding standing or the irreparable harm that Defendants’ forced return policy is causing the Clinic. I would travel to San Diego on the Clinic’s behalf. A trip to San Diego would require one to two days of travel, and require that I divert that time from my case work and teaching responsibilities. It would be far more convenient for the Clinic to participate in this case in San Francisco.
5. The Clinic is currently representing named Plaintiff Howard Doe in his removal proceedings.

Dated: _____

2/28/2019



Jacqueline Brown Scott, Esq.